



U.S. Department of Justice

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May 24, 2019

Attorney Joseph Bugni
Federal Defender Services of Wisconsin, Inc.
22 East Mifflin Street, Suite 1000
Madison, WI 53703

Re: *United States v. Andrew W. Kawleski*
Case No. 19-cr-25-wmc

Dear Attorney Bugni:

Pursuant to your request and the Court's order, the purpose of this letter is to provide notice pursuant to Rule 16(a)(1)(G) of the government's intent to use expert testimony during its case-in-chief at trial.

The government intends to call State of Wisconsin Department of Justice; Division of Criminal Investigation Digital Forensics Examiner Erik Erdman to testify as an expert in case. Erdman will opine that certain data, including but not limited to messages, images, and videos, were located on electronic devices seized from the defendant. He will also testify about any internet searches conducted by the defendant. Erdman's opinion is based on his training and experience in the extraction of data from mobile phones, electronic media, and computers, his familiarity with the process for extracting data, and his personal extraction of data from electronic devices seized from the defendant. Erdman is still in the process of completing the forensic exam. It will be provided to you when completed.

While the government does not believe this to be expert testimony, the government also intends to call Wisconsin Rapids Police Department Detective David Bailey to testify about his review of the PNG flash drive that is named in Count 1 of the indictment.

Attached are Erdman's CV and his preview report.

Very truly yours,

SCOTT C. BLADER
United States Attorney

By: /s/
ELIZABETH ALTMAN
Assistant United States Attorney

Enclosures

ecf: United States Magistrate Judge Stephen L. Crocker
(without enclosures)